IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§ Case No. 16-34028
NORTHSTAR OFFSHORE GROUP, LLC	§ § 8
Debtor.	§ Chapter 11 §
JAMES KATCHADURIAN, Litigation	<u> </u>
Trustee, on behalf of Northstar Litigation	§
Trust,	§
	§ ADVERSARY NO. 18-03079
Plaintiff,	§
V.	§
	§
NGP ENERGY CAPITAL	§
MANAGEMENT, LLC; NGP X US	§
HOLDINGS, L.P.; NGP NATURAL	§
RESOURCES X, L.P.; NGP X PARALLEL	§
HOLDINGS, L.P.; NGP NATURAL	§
RESOURCES X PARALLEL FUND, L.P.;	§
NOG ROYALTY HOLDINGS, LP;	§
CHRISTOPHER RAY; JESSE BOMER;	§
TOMAS ACKERMAN; DAVID ALBIN;	§
DAVID HAYES; S. GLYNN ROBERTS;	§
GAYLON FREEMAN; MARK STEVENS;	§
and JAMES P. ULM, II,	§
	§
Defendants.	§

MOVANTS', NORTHSTAR DIRECTORS, JURY DEMAND

Northstar Directors, Movants,¹ hereby demand a trial by jury under the Seventh Amendment of the United States Constitution. *See Granfinanciera, SA v Nordberg*, 492 US 33, 64 (1989). The Movants do not consent to a jury trial held by the Bankruptcy Court.

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¹ Movants are Defendants S. Glynn Roberts, Gaylon Freeman, Mark Stevens, and James P. Ulm, II (together, "Northstar Directors").

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If it is determined that the Bankruptcy Judge, absent consent of the parties, cannot enter

final orders or judgment consistent with Article III of the United States Constitution, the

Movants do not consent to entry of final orders by the Bankruptcy Judge.

Simultaneously with the filing of this Jury Demand, the Movants are filing a joinder in

motion to withdraw the reference to Bankruptcy Court so that the jury trial may be conducted in

District Court.

Dated: June 21, 2018.

Respectfully submitted,

COZEN O'CONNOR

By: <u>/s/ Stephen B. Edmundson</u>

Stephen B. Edmundson

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ATTORNEYS FOR DEFENDANTS

S. GLYNN ROBERTS;

GAYLON FREEMAN;

MARK STEVENS; AND

JAMES P. ULM, II

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on those parties entitled to notice via this Court's ECF system on June 21, 2018.

/s/ Stephen B. Edmundson Stephen B. Edmundson